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November 28, 2022

VIA ECF AND ELECTRONIC MAIL

The Honorable Analisa Torres
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Hiring of Alvina Pillai – Notice under Rule 1.12, New York Rule of Professional Conduct

SEC v. Rio Tinto PLC, et al., No. 1:17-cv-07994 (AT) (DCF) (S.D.N.Y.)
Anton Colbert v. Rio Tinto PLC, Rio Tinto Limited, et al., No. 1:17-cv-08169(AT) (DCF) (S.D.N.Y.)

Dear Judge Torres,

I write respectfully on behalf of King & Spalding LLP and Ms. Alvina Pillai to inform the Court that Ms. Pillai, who previously served as a law clerk for Your Honor from August 2020 through September 2021, is expected to begin as an associate at King & Spalding in the near future.

Ms. Pillai has advised that, due to her service as Your Honor's law clerk, she is conflicted in connection with the above-referenced matters, Securities & Exchange Commission v. Rio Tinto PLC et al., No. 1:17-cv-07994, and Colbert v. Rio Tinto PLC and Rio Tinto Limited et al., No. 1:17cv-08169. King & Spalding represents defendants Rio Tinto PLC and Rio Tinto Limited. Accordingly, under Rule 1.12 of the New York Rules of Professional Conduct, Ms. Pillai is personally disqualified from representing anyone in connection with a matter in which she participated personally and substantially during her tenure as law clerk. To prevent imputed disqualification of other King & Spalding attorneys, starting on her first day at the firm, Ms. Pillai will be screened from any participation in the matters and any work on or related to these cases and apportioned no part of the fees therefrom.

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This letter is respectfully submitted to provide written notice that King & Spalding LLP and Ms. Pillai are in compliance with Rule 1.12 of the New York Rules of Professional Conduct. King & Spalding will continue to represent its clients, and it may properly do so under Rule 1.12(d) because:

1. King & Spalding and Ms. Pillai have agreed that, as noted, she will be timely screened from any form of participation in the above-referenced matters and any work on or related to these cases, and she will not be apportioned fees therefrom.
2. The procedures being taken to screen Ms. Pillai from the matters are: (i) a prohibition against her speaking about the matters with or in the presence of any King & Spalding personnel; (ii) a prohibition against any of the King & Spalding personnel working on the matters from speaking about them in the presence of Ms. Pillai; (iii) a prohibition against Ms. Pillai from bringing to King & Spalding any documents, files, or materials in any form or medium about the matters; and (iv) a prohibition against Ms. Pillai accessing, reading, or reviewing any documents, files, or materials in any form or medium about the matters. King & Spalding will distribute to all personnel who are working on or in the future are added to the matters a written notification setting forth these prohibitions and their obligation to abide by them strictly.

By copy of this letter, I am notifying all parties to the matters of this ethical screen in compliance with Rule 1.12.

Very truly yours,

/s/ Mark Kirsch

Mark Kirsch

cc: All Counsel of Record (Via ECF)